

UNITED STATES DISTRICT COURT - DISTRICT OF NEW HAMPSHIRE

ANDRE BISASOR, Plaintiff,

v.

CRAIG S. DONAIS; RUSSELL F. HILLIARD; DONAIS LAW OFFICES, PLLC;

UPTON & HATFIELD, LLP; and MARY K. DONAIS, Defendants.

Case No.1:23-cv-00374-JL

**PLAINTIFF'S NOTICE OF INTENT TO FILE A REPLY OR TO FILE MOTION FOR LEAVE
TO FILE A REPLY TO THE DONAIS DEFENDANTS' OBJECTION TO PLAINTIFF'S MOTION
FOR SANCTIONS AGAINST DONAIS DEFENDANTS**

1. I hereby provide this notice of my intent to file a reply or a motion for leave to file a reply to **DONAIS DEFENDANTS' OBJECTION TO PLAINTIFF'S MOTION FOR SANCTIONS AGAINST DONAIS DEFENDANTS (DOC. 199)**, pursuant to local rule 7.1(e)(1) & (2).
2. I hereby preserve the right to reply within the time prescribed by the rules. This was not an emergency motion and so rushing to rule on this motion without allowing time for a reply or precluding me from responding will be a harm to me.
3. I ask that the court wait the proper time under the files for me to file a reply or motion to reply.
4. I plan to file the replies pertaining to the motion to amend the complaint today and have no time to properly read or respond to this objection. NB: I did not file a request for an extension of this reply deadline and it was pure unwarranted biased speculation for the defendants (or anyone else including the court¹) to assume or purport otherwise that this was my intention. If that was my intent (which it was not), I would have explicitly requested it prior today or at least by now (4pm on 5-13-24), which shows no intent to do so.
5. I intend to properly refute, rebut, and show the statements of the Donais defendants in my reply.
6. I ask the court to await this reply or motion pursuant to Local Rule 7.1(e)(1) or (2).

Respectfully submitted,

/s/Andre Bisasor

Plaintiff Andre Bisasor

May 13, 2024

CERTIFICATE OF SERVICE

This filing is served to all parties of record via the e-filing system.

/s/Andre Bisasor

Andre Bisasor

¹ I just received notice that the court ruled on my emergency for clarification shortly after the Donais defendants filed their objections today, in which they outright falsely accuse me of the intention to seek extension of the reply deadlines due today and the court seemed to have taken its cue from the defendants unwarranted speculation and accusation by doubling down on the reply deadline today (in a chiding tone and manner) when there was no reason to do so, except or unless it was prompted (wrongly) by the defendants false assumptions. This is another example of the court taking cues from the defendants and making erroneous conclusions in this case, in favor of the defendants.